

MAY 09 2002

K013855

**EXHIBIT 2**

CANÈ S.r.l.  
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Rivoli-Cascine Vica (Torino) Italy  
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Contact: Mario Cané, President  
January 30, 2002

**510(k) Summary of Safety and Effectiveness**

1. **Identification of the Device:**  
**Proprietary-Trade Name:** Microjet *Crono H*  
**Classification Name:** 80 FRN  
**Common/Usual Name:** Ambulatory Infusion Pump
2. **Equivalent legally marketed devices** This product is similar in function to the Cadd-Legacy 1 Ambulatory Infusion Pump , Sims Deltec, Inc., K982838
3. **Indications for Use (intended use)** The portable Crono infusion device has been designed only for use in subcutaneous and intravenous infusion of prescribed liquid medicines.
4. **Description of the Device:** Canè s.r.l., a company that specializes in the production of ambulatory pumps, has now produced a new generation of compact pumps: Crono H, a perfect combination of high technology and innovative design. The infusion pumps which use normal commercial syringes are inevitably cumbersome and thus difficult to use in everyday life. This provokes in the patients a refuse of the therapy. A special syringe, an integral part of the Crono H allows an efficient reduction of the pump size. In this way, the patients can freely carry out the therapy at any time of the day, even during their everyday life. Patients who have been following a iron chelation therapy for a long time, often experience difficulties in absorbing the drug subcutaneously; this may lead to a catheter occlusion with consequent interruption of the infusion. Crono H has a particular mechanism which pushes directly the rubber syringe piston: so it is possible to reach a thrust force up to 3 times higher with respect to conventional pumps. In case of catheter occlusion, an innovative infusion control system makes it possible to proceed with the infusion automatically and, after the occlusion is eliminated, to complete it. For a better absorption of the drug, Crono H makes the infusion up to 3 times more fractionated with respect to traditional pumps (22 ml per impulse, using a 10/20 ml syringe). Crono H is fitted with a liquid crystal display which shows the time it takes to complete the delivery and battery charge status.
5. **Safety and Effectiveness, comparison to predicate device.** The results of bench, EMC, and user testing indicates that the new device is as safe and effective as the predicate device.

## 6. Substantial Equivalence Chart

<b>Characteristic</b>	<b>Cadd-Legacy 1 Ambulatory Infusion Pump , Sims Deltec, Inc., K982838</b>	<b>Microjet <i>CronoH</i></b>
Intended Use:	Intravenous Intra-arterial Subcutaneous Intraperitoneal Epidural Intrathecal	Subcutaneous and intravenous only
Physical characteristics:		
Power Source	2 AA alkaline batteries, AC Adapter	Lithium battery (3V) of the 123 A type
Size	4.4 x 3.8 x 1.6 x in (112x 95x41 mm)	3" x 1.85" x 1.14" (77 x 47 x 29 mm)
Weight	13.8 oz (392 grams)	4.0 oz (115 g) (battery included).
Capacity	10 ml	10 or 20 ml
Warranty:	1 year	2 years

## 7. Conclusion

After analyzing both bench and user testing data, it is the conclusion of CANE S.r.l. that the Microjet Crono is as safe and effective as the predicate device, has few technological differences, and has no new indications for use, thus rendering it substantially equivalent to the predicate device.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

MAY 09 2002

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Cane S. R. I  
C/O Mr. Daniel Kamm  
Kamm & Associates  
P.O. Box 7007  
Deerfield, Illinois 60015

Re: K013855  
Trade/Device Name: MicroJet Crono H  
Regulation Number: 880.5725  
Regulation Name: Infusion Pump  
Regulatory Class: II  
Product Code: FRN  
Dated: February 14, 2002  
Received: February 15, 2002

Dear Mr. Kamm:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

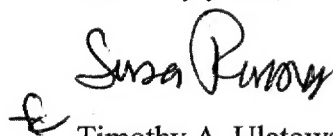
Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other

requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-\_\_\_\_. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,



Timothy A. Ulatowski

Director

Division of Dental, Infection Control

and General Hospital Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

**j) Indications for Use**

**510(k) Number K013855**

**Device Name: Microjet *CronoH* ambulatory infusion pump**

**Indications for Use:** The Microjet *Crono* ambulatory infusion pump device has been designed for use in subcutaneous and intravenous infusion of prescribed liquid medicines.

\_\_\_\_\_  
Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ✓  
(Per 21 CFR 801.109)

OR

Over the Counter Use \_\_\_\_\_

*Patricia Cuervo*  
(Division Sign-Off)  
Division of Dental, Infection Control,  
and General Hospital Devices  
510(k) Number K013855